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13
14 **UNITED STATES DISTRICT COURT**
15
16 **DISTRICT OF NEVADA**

17 SANDRA M. MEZA-PEREZ, an individual,
18 Plaintiff,
19 v.
20 SBARRO LLC dba SBARRO PIZZA, a
21 foreign limited liability company; SBARRO,
22 INC. dba SBARRO PIZZA, a foreign
23 corporation; ZACHARY CEBALLES, an
24 individual; EFRAIN HERNANDEZ, an
25 individual; JESUS ALATORRE, an
individual; DANA DORADO, an individual,
Defendants.

Case No.: 2:19-cv-373-APG-NJK

26 **STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR DANA
DORADO TO SUBMIT HER REPLY IN
SUPPORT OF HER MOTION FOR
ATTORNEY'S FEES AND COSTS
PURSUANT TO THE COURT'S ORDER
GRANTING RULE 11 SANCTIONS
AGAINST PLAINTIFF'S COUNSEL [ECF
180]**

27 **(First Request)**

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29 IT IS HEREBY STIPULATED AND REQUESTED by and between Plaintiff's counsel
30 Melanie Hill and Hardeep Sull on the one hand and Dana Dorado on the other, through their
31 respective counsel and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, that the Court extend
32 the deadline for Ms. Dorado to submit her Reply in support of her Motion for Attorney's Fees and
33 Costs Pursuant to the Court's Order Granting Rule 11 Sanctions (the "Motion"), up to, and
34 including, **January 20, 2021**. This stipulation is made and based upon the following:

35 1. On September 30, 2020, the Court entered an order granting Ms. Dorado's Motion
36 for Sanctions under Rule 11. ECF No. 177.

2. That order directed Ms. Hill, Ms. Sull, and Ms. Dorado to confer about the amount of fees and costs to be awarded pursuant to that order and, if they could not agree, to brief the matter for the Court.

3. The parties were unable to agree on the amount of costs and fees to be awarded therefore Ms. Dorado submitted the Motion on November 30, 2020.

4. By stipulation, Ms. Hill and Ms. Sull submitted their opposition to the Motion on January 4, 2021.

5. Ms. Dorado's reply is currently due on January 11, 2021.

6. Ms. Hill, Ms. Sull, and Ms. Dorado agree and request that Ms. Dorado have up to, and including, **January 20, 2021**, to file her reply in support of the Motion. This request is made in order to accommodate competing obligations held by Ms. Dorado's counsel and agreed to by Ms. Hill's and Ms. Sull's counsel as a professional courtesy.

7. This is the first request for the relief sought herein, made in good faith and not for purposes of delay.

Dated this 8th day of January 2021.

Dated this 8th day of January 2021.

/s/ Joseph Garin

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Counsel for Dana Dorado

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

Dated this 8th day of January 2021.